

DCW

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-344

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 841(a)(1)
and 841(b)(1)(A)(ii)(II))

MIGUEL EDGARDO CONCEPCION,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

KEVIN WARD, being duly sworn, deposes and states that he is a Detective with the Port Authority Police Department, assigned to the Drug Enforcement Administration Task Force, duly appointed according to law and acting as such.

Upon information and belief, on or about April 1, 2011, within the Eastern District of New York and elsewhere, the defendant MIGUEL EDGARDO CONCEPCION did knowingly, intentionally and unlawfully possess with intent to distribute a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II)).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about April 1, 2011, the defendant MIGUEL EDGARDO CONCEPCION arrived at John F. Kennedy International Airport ("JFK Airport") in Queens, New York, aboard Delta Airlines Flight No. 576 from San Juan, Puerto Rico.

2. Following his arrival, the defendant collected two checked bags from the luggage carousel in the airport's baggage claim area. Law enforcement officers approached the defendant after noticing that the defendant appeared to be nervously looking around before he collected his bags.

3. Law enforcement officers asked the defendant whether the two bags he was carrying were his. After confirming that the bags and their contents belonged to him, the defendant consented to a search of his luggage.

4. Upon inspection of the defendant's two checked bags, law enforcement officers discovered that each bag contained a false bottom. Officers then discovered that concealed within the false bottoms of both suitcases were multiple bricks wrapped in plastic. The bricks were probed and were found to contain a


^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

white powdery substance. The powdery substance field tested positive for cocaine.

5. Following defendant MIGUEL EDGARDO CONCEPCION arrest, he was given Miranda warnings which he appeared to understand and waived. The defendant then told authorities that he knew that he was transporting illegal drugs, but he did not know the quantity of drugs that he was carrying. Additionally, the defendant stated that he was to receive more than \$5,000 for transporting the illegal drugs to New York.

6. The total approximate gross weight of the cocaine found in defendant MIGUEL EDGARDO CONCEPCION's luggage is 13,823 grams.

WHEREFORE, your deponent respectfully requests that the defendant MIGUEL EDGARDO CONCEPCION be dealt with according to law.



KEVIN WARD
Detective
Port Authority Police Department
Drug Enforcement Task Force

Sworn to before me this
2nd day of ~~March~~ April 2011



THE HON
UNITED
EASTERN

S/Pollak

LAK
DGE
K